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# Lepage Environmental Services, Inc.

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August 16, 1997  
File #102

Ms. Loukie Lofchie  
Brunswick Area Citizens for a Safe Environment  
P. O. Box 245  
Brunswick, ME 04011

Subject: Review of the July 1997 *Draft Final Record of Decision for a Remedial Action at Sites 4, 11, and 13*

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Lepage Environmental Services, Inc., as a consultant to Robert G. Gerber, Inc., has reviewed the *Draft Final Record of Decision for a Remedial Action at Sites 4, 11, and 13* dated July 1997. The document was prepared by ABB Environmental Services, Inc., for the U. S. Department of the Navy for the Naval Air Station Brunswick (NAS Brunswick) located in Brunswick, Maine. In the subject document, the Navy presents the final remedial action selected for long term measures for soil and ground water contamination associated with Sites 4, 11, and 13.

The Acid/Caustic Pit at Site 4, the Fire Training Area at Site 11, and the fuel and waste liquid underground storage tanks at Site 13 are located within several hundred feet of each other. Based on environmental investigations that began in 1988, the Navy concluded that Site 11 was the primary source of ground water contamination in the Eastern Plume, and that Sites 4 and 13 are no longer contributing to ground water contamination in the Eastern Plume. In the subject document, the Navy states there will be no further action for soils at Sites 4, 11, and 13, but that remediation and long term monitoring of contaminated ground water in the Eastern Plume will continue. The Navy will be adding wells to the monitoring program to further investigate ground water contamination in the vicinity of Sites 4, 11, and 13. The Navy will also consider the need for additional investigation at Building 584 at Site 4 should it be demolished in the future.

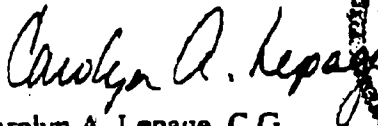
BACSE provided oral comments at the October 17, 1996, public meeting held on the *Sites 4, 11, 13 Proposed Plan*, which described the Navy's preferred option for long term measures for soil and ground water at Sites 4, 11, and 13. Written comments were provided on the March 1997 *Draft Record of Decision* in our letter to you dated April 3, 1997. The Navy has responded to most of the comments and questions raised. Our comments on the subject document are as follows:

1. **Pages 10, & 12.** The Eastern Plume, as described in the text and on Figure 2 in the June 1992 *Record of Decision for an Interim Remedial Action at the Eastern Plume Operable Unit*, is the volatile organic compound plume extending from Sites 4, 11, and 13 toward the eastern and southern boundaries of the base. The outline of the Eastern Plume on Figure 2 in the subject document should be redrawn to show the entire extent of ground water contamination related to Sites 4, 11, and 13, not just the inferred area where concentrations exceed cleanup goals. The text on page 10 should be revised as well.
2. **Pages 10 & 32.** The Navy should explain why it believes the future discharge point of the plume is no longer projected to be Harpswell Cove. An explanation along the lines of the Navy's response to comment 13 in our April 3, 1997, letter might be appropriate.
3. **Page 32.** The overburden deposits on the base property are part of a larger aquifer that extends beyond NAS Brunswick property lines. Is the Navy certain that groundwater is not used anywhere in the aquifer? Are the municipal water supply wells located within the same aquifer? Please clarify.
4. **Page 39.** The next-to-last sentence on the page seems to imply that it is acceptable to discharge volatile organic compounds to surface water because they will either volatilize or be diluted. It also seems to be at odds with the last sentence, which states that the Navy will conduct additional monitoring if the plume migrates beyond the last monitoring wells. The next-to-last sentence should be revised or removed.
5. **Page 55.** Have there been any revisions to the estimate of 13 to 71 years to attain cleanup goals throughout the plume?

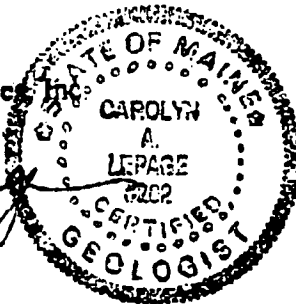
We would be happy to answer any questions you might have. Please do not hesitate to give us a call.

Sincerely,

Lepage Environmental Services, Inc.



Carolyn A. Lepage, C.G.  
President



cc: Andrews L. Tolman, Robert G. Gerber, Inc.

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